EXHIBIT A

Exhibit A – Proposed Constructions and Supporting Intrinsic and Extrinsic Evidence

A. **U.S. Patent No. 8,588,110**

Term #	Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
1	low-level policy agents (Claims 12, 13)	Not indefinite; plain and ordinary meaning *Supporting Evidence:* **Intrinsic Evidence** '110 patent at Abstract, 5:28-12:22, 36:63-78:28, 81:12-36, Figs. 9, 16, 18-21, 29, 38, 43A-43B, 44A-44B, and associated written description; claims 1-13. **Extrinsic Evidence** IPR2024-01337 and related pleadings / filings / declarations *Headwater v. Samsung*, No. 2:23-cv-00103-JRG-RSP (E.D. Tex.), Markman Order (Dkt. 118) and related pleadings / filings / declarations; including definitions and evidence regarding term "agent"	Indefinite *Supporting Evidence:* **Intrinsic Evidence** '110 patent at 8:60-9:15; 13:49-14:43; 14:59-15:28; 26:53-27:30; 42:22-47; 48:4-37; 49:1-16; 53:15-50; 75:6-10; 83:52-84:9; 91:18-94:59; 95:27-64; 98:29-67; 104:66-105:37; claims 1, 12, 13. **Extrinsic Evidence** Telecom Dictionary (2007) [SAM-HW-3_00167856–00167858]
2	low-level policy rule (Claim 12)	Not indefinite; plain and ordinary meaning *Supporting Evidence:* **Intrinsic Evidence** *See* Intrinsic Evidence for Term #1	Indefinite *Supporting Evidence:* **Intrinsic Evidence** '110 patent at 8:60-9:15; 13:49-14:43; 14:59-15:28; 26:53-27:30; 42:22-47; 48:4-37; 49:1-

Term #	Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
		Extrinsic Evidence IPR2024-01337 and related pleadings / filings / declarations	16; 53:15-50; 75:6-10; 83:52-84:9; 91:18-94:59; 95:27-64; 98:29-67; 104:66-105:37; claims 1, 12. **Extrinsic Evidence** Telecom Dictionary (2007) [SAM-HW-3_00167856–00167858]
3	first service activity is non-critical (Claim 9)	Not indefinite; plain and ordinary meaning *Supporting Evidence:* **Intrinsic Evidence** *See* Intrinsic Evidence for Term #1 **Extrinsic Evidence** IPR2024-01337 and related pleadings / filings / declarations *Headwater v. Verizon/T-Mobile/AT&T*, Nos. 2:23-cv-00352-JRG-RSP, 2:23-cv-00379-JRG-RSP, 2:23-cv-00377-JRG-RSP, 2:23-cv-00397-JRG-RSP, Markman Tentative, Forthcoming Markman Order, and related pleadings / filings / declarations; including findings and evidence regarding terms "service usage activity" and "background activity"	Indefinite *Supporting Evidence:* **Intrinsic Evidence** '110 patent at 95:65-96:47; claims 1, 9.
4	means for obtaining, through a user interface of the wireless device, a user input specifying at	Plain and ordinary meaning *Supporting Evidence:*	*Pursuant to § 112(6):* Function: obtaining, through a user interface of the wireless device, a user input

Term #	Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
	least an aspect of a first service policy (Claim 26)	**Intrinsic Evidence** '110 patent at Abstract, 5:28-12:22, 36:63-78:28, 81:12-36, Figs. 7, 9, 16, 18-21, 22A-B, 23-24, 46, and associated written description; claims 1, 27. **Extrinsic Evidence** IPR2024-01337 and related pleadings / filings / declarations	specifying at least an aspect of a first service policy Structure: a user interface and a processor configured to perform the algorithm steps of providing the user with information and accepting user choices or preferences on, e.g., service plan selection or change, and/or other service related information, settings, and/or options *Supporting Evidence:* **Intrinsic Evidence** '110 patent at 26:43-45; 26:52-27:30; 27:31-36:64; 36:65-37:2; 65:41-51; Figs. 9-16, 42D and associated written description; claims 1, 26.
5	means for identifying that the wireless device is connected to the first wireless network (Claim 26)	Plain and ordinary meaning *Supporting Evidence:* **Intrinsic Evidence** *See* Intrinsic Evidence for Term #4 **Extrinsic Evidence** IPR2024-01337 and related pleadings / filings / declarations	*Pursuant to § 112(6):* Function: identifying that the wireless device is connected to the first wireless network Structure: a processor configured to perform the algorithm steps of recognizing the type of network to which the device is currently connecting, e.g., by looking up the information in a local or network table

Term #	Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
			Supporting Evidence: **Intrinsic Evidence** '110 patent at 26:43-45; 26:52-27:30; 27:31-36:64; 36:65-37:2; 52:4-13; Figs. 9-16 and associated written description; claims 1, 26.
6	means for identifying an intended, attempted, or successful data communication over the first wireless network, the intended, attempted, or successful data communication being associated with the first service activity (Claim 26)	Plain and ordinary meaning *Supporting Evidence:* **Intrinsic Evidence** *See* Intrinsic Evidence for Term #4 **Extrinsic Evidence** IPR2024-01337 and related pleadings / filings / declarations	*Pursuant to § 112(6):* Function: identifying an intended, attempted, or successful data communication over the first wireless network, the intended, attempted, or successful data communication being associated with the first service activity Structure: a processor configured to perform the algorithm steps of implementing traffic inspection points between the applications and the networking stack application interface using a T-buffer at socket connections and feeding the side traffic into a traffic flow analyzer *Supporting Evidence:* **Intrinsic Evidence** '110 patent at 26:43-45; 26:52-27:30; 27:31-36:64; 36:65-37:2; 53:51-55; 53:58-63; Figs.

Term #	Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
			9-16 and associated written description; claims 1, 26.
7	means for applying the first service policy (Claim 26)	Plain and ordinary meaning *Supporting Evidence:* **Intrinsic Evidence** *See* Intrinsic Evidence for Term #4 **Extrinsic Evidence** IPR2024-01337 and related pleadings / filings / declarations	*Pursuant to § 112(6):* Function: applying the first service policy Structure: a processor configured to perform the algorithm steps of performing a service control that reduces traffic speed for all applications and traffic types successively until the service usage projections are within service usage limits for the present service billing period *Supporting Evidence:* **Intrinsic Evidence** '110 patent at 26:43-45; 26:52-27:30; 27:31-36:64; 36:65-37:2; 48:38-49:1; Figs. 9-16 and associated written description; claims 1, 26.

B.   U.S. Patent No. 9,647,918

Term #	Claim Term	Headwater's Proposed Construction and Supporting Evidence	Samsung's Proposed Construction and Supporting Evidence
8	the calling device application (Claims 1, 14)	Not indefinite; plain and ordinary meaning *Supporting Evidence:* **Intrinsic Evidence** '918 patent at Abstract, 23:18-24:7, 47:59-48:46, 62:10-64:25, 74:45-76:34, 93:1-94:67, 105:41-117:25; Figs. 3, 12-13, 21, 28-30, 31A-31B, 32, 35 and associated written description; claims 2-13. **Extrinsic Evidence** IPR2024-01396, -1397 and related pleadings / filings / declarations	Indefinite *Supporting Evidence:* **Intrinsic Evidence** '918 patent at 124:28-63; 126:32-64; claims 1, 14.

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